IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ADAM HOOVER,

Case No.

Plaintiff

V.

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendant

NOTICE OF REMOVAL

To: Clerk - United States District Court for the Middle District of Pennsylvania

PLEASE TAKE NOTICE THAT on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from Magisterial District Court No. MDJ-58-3-03, County of Mifflin, and in support thereof avers as follows:

- 1. Defendant Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on or about November 7, 2016, in Magisterial District Court No. MDJ-58-3-03, County of Mifflin, Commonwealth of Pennsylvania, titled Adam Hoover v. Portfolio Recovery Associates, LLC and docketed to MJ-58303-CV-0000051-2016.
- 2. This removal is timely under 28 U.S.C. § 1446(b). Defendant first received a copy of Plaintiff's Complaint by service on November 23, 2016.
- 3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all process, pleadings and orders received by Defendant in the state court action.

- 4. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against the Defendant alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, et. seq.
- 5. On this date, Defendant has provided notice to all parties and to the Magisterial District Court, Dist. No. MDJ-58-3-03, Commonwealth of Pennsylvania, County of Mifflin, of this Notice of Removal.

WHEREFORE, Defendant removes this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

BARRON & NEWBURGER, F.C.

By:

LAUREN M. BURNETTE, ESQUIRE

PA I.D. No. 92412

450-106 State Road 13 N., Suite 326

St. Johns, FL 32259

(904) 201-9120

lburnette@bn-lawyers.com

Counsel for Defendant Portfolio Recovery

Associates, LLC

Date: December 7, 2016

CERTIFICATE OF SERVICE

I certify that on the 7th day of December, 2016, a true copy of the foregoing Notice was served on Plaintiff Adam Hoover via email to amhoover 1770@gmail.com.

I further certify that on the 7th day of December, 2016, a true copy of the foregoing Notice was served on the persons below via U.S. Mail, postage prepaid:

Hon. Kent A. Smith MDJ-58-3-03 96 South Main Street P.O. Box 580 Reedsville, PA 17084

BARRON & NEWBURGER, P.C.

By:

DAUREN M. BURNETTE, ESQUIRE

PA I.D. No. 92412

450-106 State Road 13 N., Suite 326

St. Johns, FL 32259

(904) 201-9120

lburnette@bn-lawyers.com

Counsel for Defendant Portfolio Recovery

Associates, LLC

Date: December 7, 2016